

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CASA EXPRESS CORP, as Trustee of
CASA EXPRESS TRUST,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 18 Civ. 11940 (AT)
Related to 19 Civ. 3123 (AT)

NOTICE OF MOTION FOR RELIEF PURSUANT TO 28 U.S.C. § 1610(c)

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated May 18, 2021, and the accompanying Declaration of David M. Levine, dated May 18, 2021, Plaintiff Casa Express Corp, as Trustee of Casa Express Trust, by and through its undersigned counsel, make a motion to this Court before the Honorable Analisa Torres, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York, for an order pursuant to 28 U.S.C. § 1610(c) determining that a reasonable period of time has elapsed since this Court's October 16, 2020 Final Judgment order against Defendant Bolivarian Republic of Venezuela.

Dated: May 18, 2021

Respectfully submitted,

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/s/ David M. Levine

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*Attorney for Plaintiff Casa Express Corp.,
as Trustee of Casa Express Trust*